

Billing Records for 115-L044: <u>Miranda et al. v. Grace Farms, Inc., et al.</u>				
Date	Attorney	Time Spent (Hours)	Notes	Paralegal
12/22/2015	RA	1.2	Intake of client Miranda	P
12/28/2015	RA	1	Intake of client Rodas	P
1/4/2016	RA	0.8	Intake of client Garcia	P
1/13/2016	RA	1.3	Intake of client Grande	P
1/19/2016	RA	0.4	Research on corporate and individual defendants, called clients for more info on defs	P
1/22/2016	RA	1.2	Calculations of damages for all plaintiffs	
2/1/2016	RA	0.2	Call w/ client re: additional potential clients	
2/11/2016	RA	0.8	Drafting of complaint	
2/17/2016	RA	0.7	Continue drafting complaint; call clients to come in to review	P
2/22/2016	RA/HFD	0.4	Discussion re: putting case in suit	
2/23/2016	RA	1.8	Review complaint w/ all plaintiffs, prepare cover sheet, summons, file on ECF	P
2/25/2016	N/A	0.3	Make copies, mail Complaint to process server	P
2/29/2016	RA	0.3	Call from def Vivek; spoke about case, possibility of settlement	
3/8/2016	RA	0.1	Update to client	P
3/10/2016	RA	0.2	Update to client	P
3/14/2016	RA	0.5	Recvd AOS for each def, reviewed and filed on ECF, filed statement of related action	
3/15/2016	RA	0.5	Def Vivek brought in records, reviewed, put in file	
3/28/2016	RA	0.2	Update to client	P
3/30/2016	RA	0.1	Left message for def	
4/5/2016	RA	0.4	Began drafting DJ motion	
4/14/2016	RA	0.1	Update to client	P
4/15/2016	RA	0.5	Spoke to Vivek re: settlement, discussed numbers, told him we are continuing w/ case	
4/19/2016	RA	0.3	Spoke w/ Nolan Klein, retained by defs, time to answer, status of settlement talks	
4/28/2016	RA	0.5	Defs filed Answer, printed and reviewed	
5/16/2016	RA	0.7	Met w/ clients for status update, re: no settlement, continuing w/ case in court	P
6/10/2016	RA	0.2	Recvd Init Conf Order, reviewed, entered dates, read Judge's Rules	
6/30/2016	RA	0.4	Drafted init conf worksheet, joint init conf letter, sent to def atty	
7/1/2016	RA	0.4	Discussed init conf worksheet & joint letter w/ defs, finalized, filed on ECF	
7/8/2016	RA	0.7	Reviewed file for init conf, INIT CONF TELECONF, entered dates into system for disc	
7/13/2016	RA	0.8	Drafted initial disclosures, interrogatories and doc demands; sent to def atty	
7/18/2016	RA	0.5	Call w/ Nolan Klein, Teleconf w/ Judge Francis	
7/19/2016	RA	0.4	Drafted revised document demands for settlement conf; sent to def atty	
7/26/2016	RA	0.4	Update to all clients re: status and settlement conf date	P
8/10/2016	RA	0.2	Recvd defs' initial disclosures, reviewed, put in file	
8/12/2016	RA	0.7	Calls w/ def atty re: adj settlement, call to chambers for new date, review ltr filed by def	

8/17/2016	RA	0.4	Update to all clients on new settlement conf date	P
9/12/2016	RA	0.1	Gave ext to defs to provide docs for conf	
9/19/2016	RA	0.8	Recvd records from defs; reviewed records in adv of settlement conf	
9/22/2016	RA/JO	0.5	Reviewed records, calculations, discussed settlement conf details	
9/23/2016	RA/JO	1.5	Met w/ client before conf to discuss, SETTLEMENT CONF (Unsuccessful)	
10/18/2016	RA	0.2	Update to clients	P
10/26/2016	RA	0.1	Agreed to ext of time to complete disc	
10/28/2016	JO	0.2	Discussed new dates for amended scheduling order; defs filed	
10/31/2016	RA	0.1	Recvd new scheduling order; entered dates in system	
11/15/2016	RA	0.5	Recvd Order re: consolidation, reviewed other filed case	
11/23/2016	RA	0.2	Call w/ def atty re: adj disc due to potential consolidation, defs filed letter	
12/1/2016	RA/JO	0.2	Discussion re: consolidation, agreed not to oppose	
12/2/2016	RA	0.2	Drafted and filed letter re: consolidation	
12/8/2016	RA/JO	0.2	Discuss case, prepare for conference	
12/9/2016	JO	0.5	Conference re: consolidation	
12/23/2016	RA	0.4	Call from def Vivek; called def atty and advised def contacting us directly	
1/5/2017	JO	0.7	Discuss amended cmplt; back and forth emails w/ co-pltf counsel, reviewed am cmplt	
1/10/2017	RA	0.6	Reviewed amended complaint; advised co-pltf counsel no issues	
1/16/2017	JO	0.2	Finalized amended complaint; filed on ECF	
1/24/2017	JO	0.6	Amended scheduling order, calls w/ attys, filed on ECF	
1/25/2017	JO	0.1	Recvd Order on scheduling order, entered dates in system	
1/26/2017	RA	0.1	Letter from defs re: complaint missing numbers	
1/27/2017	RA	0.3	Revised complaint and re-filed on ECF	
1/30/2017	RA	0.3	Call w/ attorneys, drafted and filed letter re: cancel conf on 2/2; re-filed complaint	
1/31/2017	RA	0.4	Defs filed Answer, printed and reviewed	
2/10/2017	RA	0.1	Reviewed defs amended init disc	
2/23/2017	JO	0.2	Emails w/ co-pltf re consolidated disc demands	
2/27/2017	JO	0.6	Edited consolidated disc demands, sent to co-pltf atty for review	
2/28/2017	JO	0.2	Emails w/ co-pltf, finalized disc demands, sent to def atty	
3/3/2017	RA	0.5	Received def disc demands, contacted clients to come in to discuss/review	P
3/24/2017	RA	0.3	Update to clients; trying to sch time to come in to respond to defs demands	P
5/4/2017	JO	0.3	Revised scheduling order	
5/8/2017	RA	0.2	Recvd Order re: scheduling order, printed, entered new dates in system	
5/9/2017	RA	0.5	Recvd defs' disc responses, reviewed responses and docs, put in file	
5/11/2017	JO	0.1	Emails re depositions	
5/15/2017	JO	0.2	Emails re adj conf	
5/17/2017	JO	0.5	Multiple emails w/ defs re: depositions, call clients to see availability	P

5/22/2017	JO	0.4	Multiple emails again w/ defs re: depositions, call clients to see availability	
5/26/2017	JO	0.6	Finalized depo schedule; called clients gave them dates, location, prep times	P
6/13/2017	RA	0.3	Called clients arranged for them to come 6/16 for disc responses	P
6/16/2017	RA	1.8	Met w/ clients, went over disc responses, drafted and finalized responses	P
6/29/2017	RA	0.3	Made copies, mailed out disc responses to defs	
6/29/2017	JO	0.3	Calls/emails w/ def atty, rescheduling depositions, called clients to confirm new dates	P
7/11/2017	RA	1.1	Confirmed depositions w/ def atty; met and prepped first 2 clients for depositions on 7/13	P
7/12/2017	RA	0.2	Emails re: rescheduling conf	
7/13/2017	JO	3.7	Prep and depositions of Grande and Garcia	
7/18/2017	RA	0.8	Prep clients for depositions on 7/19	P
7/19/2017	JO	3.6	Prep and depositions of Miranda and Rojas	
7/20/2017	JO	0.8	Entered in notes from four plaintiff depositions	
7/28/2017	JO	0.3	Calls w/ attys and file status report	
7/29/2017	RA	0.6	Reviewed co-plt's disc responses	
8/7/2017	JO	0.2	Calls w/ defs, confirmed depositions for defs	
8/10/2017	JO	0.5	Prepare for defs depositions	
8/11/2017	JO	4.1	Def depositions	
8/14/2017	JO	0.3	Entered in notes from def depositions	
8/28/2017	RA	0.5	Updates to all clients disc complete, possible 2nd settlement conf	P
8/29/2017	JO	0.4	Emails/calls re: stipulating to dismiss Def Rajni	
8/31/2017	JO	0.6	Status conference	
9/5/2017	JO	1.2	Revised Plaintiffs calculations of damages based on deposition testimony	
9/5/2017	JO	0.2	Emails re sch settlement conf	
9/6/2017	RA/JO	0.2	Conversation re dismissing Def Rajni	
9/7/2017	JO	0.3	Emails w/ attys re agree to dismiss against Def Rajni	
9/13/2017	JO	0.5	10+ emails w/ attys and court re: settlement/settlement conf	
9/14/2017	JO	0.4	Recvd additional records from def atty, 200+ pages, printed, reviewed	
9/15/2017	JO	0.2	Emails w/ attys re settlement	
9/18/2017	JO	0.2	Emails w/ attys and court scheduling settlement conf	
9/22/2017	RA	0.1	Recvd Order scheduling settlement conf, entered dates in system	
9/25/2017	RA	0.5	Update to all clients, gave date/time of settlement conf	P
10/17/2017	RA	0.3	Met w/ clients, discussed settlement possibilities, confirmed attendance	P
10/20/2017	JO	1.5	Settlement Conf (unsuccessful)	P
10/31/2017	JO	0.2	Emails re JPTO/status letter	
11/1/2017	JO	0.2	Emails re JPTO/status letter	
11/6/2017	JO	0.1	Emails re status letter	
11/7/2017	JO	0.1	Joint Status letter filed and printed	

11/13/2017	JO	0.1	Recvd order; entered dates in system	
12/11/2017	JO	1.3	Drafted JPTO, sent to attys	
12/13/2017	JO	0.5	JPTO work, emails w/ attys, req for ext to file JPTO	
12/26/2017	JO	0.3	JPTO, emails w/ attys	
12/27/2017	JO	0.3	Emails re ext to file JPTO; filed letter req ext	
12/28/2017	RA	0.1	Recvd order, entered in dates in system	
1/5/2018	JO	0.1	Emails re JPTO	
1/8/2018	JO	1.6	Emails with attys/JPTO/Verdict Sheet/Jury Instructions/Voir Dire	
1/9/2018	JO	0.5	Emails with attys/JPTO/Verdict Sheet/Jury Instructions/Voir Dire	
1/15/2018	JO	0.1	Emails with attys	
1/22/2018	RA	0.2	Update clients	P
2/13/2018	JO	0.7	Review defs Motion to withdraw, enter new dates from Order, ext to file trial docs	
2/14/2018	RA	0.2	Got order on motion to withdraw, updated clients on 4/24 trial date	P
3/6/2018	JO	0.4	Emails with atty Nolan, co-pliffs counsel, re: settlement, calculations	
3/12/2018	JO	0.3	Emails re: Nolan withdrawing as def counsel	
3/13/2018	JO	0.5	Emails re: motions in limine, withdrawing counsel, etc.; reviewed motion to withdraw	
3/19/2018	JO	0.2	Reviewed defs letter re: withdrawing; entered conf date	
3/23/2018	RA	0.5	Conf re: def atty withdrawing; enter dates after when Order recvd	
3/26/2018	JO	0.1	New def atty filed app; taking over for defs counsel	
3/27/2018	RA	0.2	Call w/ def	
3/28/2018	RA	0.2	Call w/ def atty re: settlement	
4/5/2018	JO	0.7	Conference re: trial, talk w/ attys after re: scheduling	
4/11/2018	RA/JO	0.4	Emails w/ attys, call clients to confirm trial availability, joint letter re trial date	P
4/12/2018	JO	0.2	Emails w/ attys	
4/13/2018	JO	0.1	Recvd dates from Order, entered in system	
5/17/2018	RA	0.3	Speak w/ clients re: update, settlement offers, etc.	P
6/5/2018	JO	0.2	Call w/ atty re settlement offers	
6/12/2018	RA/JO	0.2	Call re settlement	
6/14/2018	RA/JO	0.2	Calls re settlement	
6/18/2018	RA/JO	0.2	Continued settlement discussions	
6/20/2018	RA/JO	0.5	Meet and speak w/ clients re settlement	P
6/22/2018	JO	3.6	Motion in limine to exclude immigration status/tax records	
7/2/2018	JO	1.1	Recvd Offer of Judgment from defs, discussed, emails re: JPTO, voir dire, etc.	
7/3/2018	RA/JO	0.6	Discuss Offer of Judgment w/ clients, discuss settlement, trial options	P
7/6/2018	RA/JO	0.7	Settlement discussions w/ attorney, then clients, confirmed settled w/ def atty	P
7/9/2018	RA/JO	0.6	Meet w/ all clients, explained settlement logistics, etc.	P
7/10/2018	JO	1.5	Performed settlement allocations; drafted settlement agreement, sent to def atty	



7/11/2018	RA	0.6	Defs filed motion to withdraw, printed/reviewed,	
7/12/2018	RA/JO	0.3	Call w/ def atty re: withdrawing, settlement, etc.; updated clients	P
7/16/2018	JO	0.3	Finalizing settlement agreement, received proof of check	
7/17/2018	JO	0.7	Rounds of edits to agreement, finalized, phone calls w/ def re: 7/18 conf	
7/18/2018	HFD	0.6	Conference re: defs withdrawing as attorneys	
7/19/2018	RA	0.3	Update to clients	P
7/20/2018	JO	0.6	Draft fairness letter, prepare billing records	
7/21/2018	JO	0.3	Finish drafting fairness letter, send to def atty	

	<b>Total Hours</b>	
RA	40.6	40.6 * \$375.00 = \$15,225.00
JO	47.9	47.9 * \$200.00 = \$9,580.00
HFD	1	1 * \$450.00 = \$450.00
Paralegal	22.9	22.9 * \$75.00 = \$1,717.50
		<b>Total: \$26,972.50</b>